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May 29, 2018

VIA ECF

The Honorable Joanna Seybert
United States Senior District Judge
United States District Court
Eastern District Of New York
100 Federal Plaza
Central Islip, NY 11722

Re: U.S. v. Chartier, et al., 17-CR-00372 (JS)
Defendant's Unopposed Motion to Modify Conditions of Release

Dear Judge Seybert:

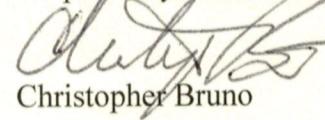
We represent Defendant Erik Matz in the above-referenced matter. Mr. Matz respectfully requests the Court's permission to modify the conditions of his release. Specifically, Mr. Matz requests that he no longer be subject to electronic monitoring as a condition of his bail. The Government does not object to Mr. Matz's request to modify the conditions of his release.

Mr. Matz entered a plea of guilty before Your Honor to Counts One, Two and Nine of the pending indictment on April 11, 2018. Since his release on July 12, 2017, Mr. Matz has been fully compliant with all of the conditions of his bail. Currently, Mr. Matz has an employment opportunity to begin work as a salesman for a home security company in the Tri-State area. The employment opportunity will require evening meetings with prospective customers and would conflict with the curfew imposed by electronic monitoring. Accordingly, we respectfully request that the Court relieve Mr. Matz from the electronic monitoring requirement.

As stated above, we have communicated with AUSA Patrick Hein and the Government has no objection to this request. In addition we have also communicated with Pretrial Officer Brian Manganaro about this request and he stated that while his office does not officially take a position regarding the removal of an electronic monitoring condition, he would like it noted that Mr. Matz has been fully compliant with his curfew while under supervision.

Thank you for your consideration regarding this request.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "Christopher Bruno".

Christopher Bruno

cc: AUSA Patrick Hein (by ECF)
U.S. Pretrial Services Officer Brian Manganaro (by email)